

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

\* \* \* \* \*  
STEPHEN BECKMAN,  
Plaintiff

VS.

BULL HN INFORMATION SYSTEM, INC.,  
Defendant

\* \* \* \* \*

\* CIVIL ACTION  
\* NO. 03-cv-12567  
\*  
\*  
\*

**DEPOSITION OF STEPHEN BECKMAN**, called by the  
Defendant, pursuant to Rules 26 and 30 of the Federal  
Rules of Civil Procedure, before Ruth E. Hulke, Certified  
Shorthand Reporter No. 114893 and Notary Public for the  
Commonwealth of Massachusetts, at Wilmer, Cutler,  
Pickering, Hale and Dorr, LLP, 60 State Street, Boston,  
Massachusetts, on Thursday, December 16, 2004, commencing  
at 12:00 p.m.

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Hearings ♦ Conferences ♦ Legal Proceedings

1 Q. Why did you leave A. A. Watchman?

2 A. I got bored with public accounting.

3 Q. Do you remember where you next went from A. A.  
4 Watchman?

5 A. I think it was Honeywell which is now Bull or  
6 whatever you want to call it.

7 Q. So you went to the entity then known as  
8 Honeywell?

9 A. Yeah.

10 Q. In what capacity?

11 A. Probably an entry level accountant.

12 Q. Now, before I take you through your employment  
13 history with Honeywell and Bull, let me just ask you  
14 this, sir. Were you ever terminated from any of your  
15 employers --

16 A. No.

17 Q. -- before Honeywell?

18 A. No.

19 Q. Did you ever bring a claim against any employer  
20 before this claim against Bull?

21 A. No.

22 Q. Have you ever testified in a deposition before,  
23 sir?

1 your work was as an accountant for that?

2 A. Shipment.

3 Q. What did you do with regard to shipments?

4 A. Costed out the total value of the computer  
5 equipment going out the door and booked the inventory  
6 relief.

7 Q. Did you have any other responsibilities?

8 A. No. That was full time.

9 Q. Was there a particular product or product line  
10 that you were working with?

11 A. All. Whatever product line they had at that  
12 point in time.

13 Q. Do you recall whether you received any  
14 promotions while at Honeywell?

15 A. Yes.

16 Q. Into what position?

17 A. Became the supervisor of shipments, which was  
18 called, I think, equipment control, but I'm not sure.

19 Q. Was that still in Brighton?

20 A. Yes, it was.

21 Q. What year?

22 A. You know, 28 years, you just can't remember.  
23 Then I became the supervisor.

1 Q. Did you have any promotions after becoming the  
2 supervisor of shipments?

3 A. I became a supervisor in Framingham.

4 Q. Was this while it was still Honeywell?

5 A. They had bought this company. And I had to go  
6 over there and set up the shipment system there.

7 Q. Were you still doing the same job  
8 responsibilities --

9 A. Basically.

10 Q. -- as you described? So you were still costing  
11 the value of computer equipment and booking inventory  
12 relief?

13 A. Yes.

14 Q. Anything else?

15 A. Inventories.

16 Q. Were you promoted at any other time while it  
17 was still Honeywell?

18 A. I think after that, sometime in between those  
19 two I may have been promoted -- I can't remember. All I  
20 know is I worked for purchasing for a while. I became  
21 their accountant, and we set up commodity controls which  
22 was assigning each part a different commodity code, and  
23 we developed that system. And I was the link between

1 purchasing and accounting setting standards, and that  
2 lasted for a while. I can't remember the time frame when  
3 it was in there. Then I think from Framingham I went to,  
4 I think I went back to Brighton, and I had shipments and  
5 labor, I was doing labor there. Then I went to  
6 Billerica, and now it was basically staff type person,  
7 not supervisor.

8 Q. In what area?

9 A. Different level. It became long-range plans.  
10 First it was cost estimate. Then we did, I went into the  
11 long-range plans, and I stayed at that for quite a while.  
12 Then eventually I was asked to go up to Lawrence and  
13 handle the shipments and a new system they were  
14 designing, MINX.

15 Q. By that time was it Bull as opposed to  
16 Honeywell?

17 A. Oh, yeah. Yeah.

18 Q. Do you have a recollection of when that  
19 transition occurred?

20 A. They did so many things. I mean, they bought  
21 up different companies. They bought up GE, computers,  
22 and I can't remember whether that was part -- No, I think  
23 it was still Honeywell at that time. Then --

1 MS. EDGREN: She just asked if you remember at  
2 what point.

3 A. I don't remember the dates.

4 Q. Basically, once Bull acquired Honeywell, did  
5 you just continue in your same capacity with the new  
6 employer?

7 A. Yeah. It was just a different name.

8 Q. With regard to the positions that you held at  
9 Honeywell and then at Bull, were they all in the  
10 accounting field?

11 A. Yes.

12 Q. You have no engineering background, do you?

13 A. No.

14 Q. Now, I think the last position you had taken us  
15 up to was the position in Lawrence dealing with shipments  
16 and the MINX system. Do you have a memory of when you  
17 first went to Lawrence?

18 A. Somewhere after '92.

19 Q. Did you remain at Lawrence until your layoff?

20 A. Yes.

21 Q. Do you recall what your job title was at  
22 Lawrence?

23 A. No.